

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION

DANIELLE SPEARS,	*	
Plaintiff,	*	
V.	*	CASE NO. 7:24-3211-DC-RCG
NEXT BRIDGE HYDROCARBONS, INC.,	*	
GREGORY MCCABE, JOHN BRDA,	*	
SECURITIES AND EXCHANGE COMMISSION,	*	
FINANCIAL INDUSTRY REGULATORY AUTHORITY	*	
JANE DOES 1-20, JOHN DOE 1-20	*	
Defendants.	*	

**PLAINTIFF’S NOTICE OF NON-OPPOSITION AND CLARIFICATION REGARDING
MCCABE’S MOTION TO EXTEND**

Plaintiff Danielle Spears, appearing Pro se, respectfully submits this Notice to clarify the record concerning the *Certificate of Conference* filed in connection with Defendant Gregory McCabe’s Opposed Motion to Extend Pleading Deadline (Dkt. 33). Plaintiff does not oppose the relief requested by Defendant McCabe; however, Plaintiff seeks to correct a material misrepresentation made to the Court by counsel for Defendant.

1. On April 29, 2025, Plaintiff received a phone call from Ryan D. Lantry, counsel for Defendant McCabe, who stated that his firm was taking over representation from prior

counsel and was seeking additional time to prepare a response.

2. During this conversation, Plaintiff initially declined the request but subsequently stated that she was out of town and would need until Monday, May 5, 2025, to determine whether she could agree to a future date that would be mutually acceptable. Mr. Lantry verbally agreed to this timeline.
3. Despite this verbal understanding, Mr. Lantry filed an opposed motion the following day, on April 30, 2025, and certified to the Court that Plaintiff was opposed to the requested relief (Dkt. 33 at 4). This statement is inaccurate and mischaracterizes Plaintiff's position at the time of the call.
4. When contacted by Plaintiff following the filing, Mr. Lantry denied the agreement and claimed that Plaintiff had flatly refused the extension—a claim Plaintiff categorically denies.
5. Plaintiff wishes to make clear that she does not oppose the requested extension of time for Mr. McCabe to respond. However, Plaintiff respectfully objects to being misrepresented in filings with the Court and being placed in a false light. These tactics are inappropriate and undermine the civility and candor expected of officers of the Court.
6. Plaintiff respectfully requests that the Court take notice of this clarification and caution defense counsel that any further attempts to misstate her position, misrepresent

communications, or exert undue pressure will be met with appropriate legal response.

Respectfully submitted

/s/ Danielle Spears

Danielle Spears

Pro Se Plaintiff

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